

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JAN 25 2017

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

LARRY HULTS,

Defendant.

4:17CR042 CEJ/NAB

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-

anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C

§2256(2)(A));

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. §2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about August 2012, to March 25, 2015, within the Eastern District of Missouri and elsewhere,

LARRY HULTS,

the defendant herein, knowingly possessed material that contained an image of child pornography that was produced using materials that traveled in interstate and foreign commerce, that being a Seagate Barracuda hard disc drive, that had been produced or manufactured outside Missouri and therefore having traveled in interstate and foreign commerce, and said drive contained child pornography including but not limited to the following:

a. "!! new pthc sdpa private pics 13 yo daughter bianca homemade (17).jpg" more fully described as a graphic image file of a minor female with her legs spread apart in a

lascivious display of her genitals and engaged in sexually explicit conduct;

b. "((pthc)) 11 yo bj with cum (10)(2).jpg" more fully described as a graphic image file of an adult male and a prepubescent female who is sitting and engaged in sexually explicit conduct, that being oral sex;

c. "boys 3some rbv kdv pt prt pthc pjk kids boy little hairless 03(3).jpg" more fully described as a graphic image file of three prepubescent males engaged in sexually explicit conduct that being oral sex;

d. "- (sdpa) alicia 10 yo pthc little girl loves adult sex(2)(3)(2).avi" more fully described as a video file of an adult male and prepubescent female on a bed lasciviously displaying her genitals and being engaged in sexually explicit conduct that being sexual intercourse and oral sex;

e. "(! pthc kinderkutje composite 01 - father and his 8-10yr twins daughters - 13m19s~1(2)(3)(2)(2).avi" more fully described as a video file of an adult male and two minor females engaged in sexually explicit conduct that being sexual intercourse and oral sex;

f. "(pthc) notta 9 yo girl & men.mpg" more fully described as a video file of an adult male and a prepubescent female engaged in sexually explicit conduct that being sexual intercourse and oral sex;

g. "(kleuterkutje) (kinderkutje) babyj - doggied on bed 7yr old(2).mpeg" more fully described as a video file of an adult male and a prepubescent female on a bed engaged in sexually explicit conduct, that being sexual intercourse;

In violation of Title 18, United States Code, Section 2252(a).

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

MATTHEW T. DRAKE - 46499MO
Assistant United States Attorney